

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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IME WATCHDOG, INC.,

Plaintiff,

**Civil Action No.:**

1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,

GREGORY ELEFTERAKIS, ROMAN POLLAK,

ANTHONY BRIDDA, IME COMPANIONS LLC,

CLIENT EXAM SERVICES LLC, and IME

MANAGEMENT & CONSULTING LLC,

Defendant.

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1. I am an associate of the Alber firm, p/k/a the Law Offices of Michael J. Alber, P.C.
2. I make this affirmation in support of the motion to withdraw as counsel.
3. The motion is made on behalf of Kenneth C. Brown and the Alber firm.
4. Kenneth Brown had appeared in the case as an associate of the Alber firm.
5. I have reviewed the court file as well as spoken to Mr. Brown in regard to this application. Mr. Brown has authorized me to make this motion on his behalf.
6. Mr. Brown appeared as an *Attorney to be Noticed* on behalf of defendants Vito and Safa Abdulrahim Gelardi and IME Companions LLC.
7. As the Magistrate Judge noted on the docket for July 11, 2025, the defendants acknowledge that Mr. Brown was no longer representing them.
8. The lead counsel for these defendants has withdrawn and at this point these defendants are acting pro se.
9. The Magistrate Judge requested that Mr. Brown file a motion to withdraw as counsel.
10. I spoke with Mr. Brown who requested that I file the motion on his behalf since he is no longer associated with the Alber Firm.

11. Both of these defendants already appear on the docket as Pro Se defendants and receive all filed papers through ECF. They are the owners/members of defendant IME Companions LLC and acknowledge that the representation of Mr. Brown and the firm with this defendant has been terminated.
12. No prior application for the relief herein requested has been made.
13. On behalf of Kenneth C. Brown and the Alber Firm we would request that the motion be granted in all respects

WHEREFORE the Alber Firm Respectfully requests an order granting the instant motion in its entirety permitting the Alber firm and Kenneth C brown to withdraw as counsel of record for Safa Abdulrahim Gelardi and Vito Gelardi and IME Companions LLC granting such further relief as maybe just.

Dated: Huntington Station, NY

July 16, 2025

*Lawrence Katz*

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Lawrence Katz, Esq.  
*Attorneys for Defendants*  
THE ALBER FIRM, P.C.  
21 Walt Whitman Road  
Huntington Station, NY 11746  
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**CERTIFICATE OF SERVICE**

This is to certify that on this 16<sup>th</sup> day of July 2025, a true and accurate copy of the Plaintiff's Notice of Motion and accompanying Affirmation, were served upon all parties via this Court's CM/ECF system.

Dated: Huntington Station, NY  
July 16, 2025

Respectfully,

*Lawrence Katz*

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Lawrence Katz, Esq.

*Attorneys for Defendant*

